WT Docket 06-142 • Stolen Vehicle Recovery System (SVRS) Rules

Comments of Hammett & Edison, Inc., Consulting Engineers

This filing is in response to the Commission's January 24, 2011, Public Notice, DA 11-123, *Public Safety and Homeland Security Bureau Seeks Comment on Partial Request for Waiver Filed by the Lojack Corporation*. The comment deadline is February 8, 2011, so this filing is timely.

The ULS Does Not Allow Differentiating Between Police Radio Licensees and Public Safety Licensees

The Lojack Corporation ("Lojack") waiver request asks, among other things, to expand the pool of eligible entities from only Police departments to all Public Safety Pool licensees. However, when we attempted to search the Universal Licensing System (ULS) in order to compare the number of Police radio licensees to Public Safety Pool licensees, we could find no means for such a search. We then queried Wireless Telecommunications Bureau (WTB) staff, to find out if there would be a way to obtain such information. We were advised as follows:

Unfortunately, the ULS search does not query the eligibility field and most public safety licensees have combined licenses that are not identified as being used for police activities.

If you have access to a database programmer, specific queries can be developed from the public access field to query the eligibility and licensee name field to extract some of the information you need. Even with a specific search of the eligibility fields, most police entities will not be found. [Bolding added.]

Thus, there is no reasonable means for interested parties to determine how such an expansion in the eligibility pool for 173.075 MHz Lojack stations, an admitted interference risk to TV Channel 7 (174-180 MHz) TV stations, might increase the number of such stations, and their interference potential to TV Channel 7. Given the inability of the ULS to provide such basic information at the present time, it would appear premature for the FCC to allow any expansion of the Lojack eligibility pool.

February 8, 2011

